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Subject Environmental Defense comments on 4,4'-Methylenebis(2-Chlorobenzenamine) (CAS #101-14-4)

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(Submitted via Internet 6/5/06 to oppt.ncic@epa.gov, hpv.chemrtk@epa.aov, boswell. karen @ epa.aov, MTC @ mchsi.com, and Wendykoch @ eponallc.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **4,4'-Methylenebis(2-Chlorobenzenamine) (CAS #101-14-4).**

The MBOCA Consortium, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted a test plan and robust summaries for **4,4'-Methylenebis(2-Chlorobenzenamine),** also known as MOCA. According to this submission, MOCA is produced in Japan and Taiwan and used in the United States in the manufacture of castable polyurethane products. It is said to be uniquely suited for this purpose.

This well-written test plan is quick to point out MOCA has been known, for some time, to be a known animal and "Suspect Human Carcinogen". Accordingly, the industries using MOCA are said to have developed an effective program to control employee exposure that has been in place since the early 1970s. It is further stated and supported by an internet reference that governmental agencies including OSHA and EPA have been complimentary of this program to control employee exposure. Given the knowledge regarding the carcinogenic properties of MOCA and its toxicity to aquatic organisms, it is assumed that precautions are taken to assure its safe transport, limit consumer exposure and limit its release into the environment in the course of its transport and industrial use. These precautions are not currently described in the test plan, but this would be a welcome addition.

As one might expect for a known animal and suspected human carcinogen, MOCA has been the subject of appreciable study. These studies are well-summarized in a well-referenced test plan, with supporting detail in the robust summaries that consist of IUCLID database files previously submitted as part of the European Risk Assessment Program on Existing Substances. The IUCLID database file has apparently been edited to provide a concise summary of studies to address required SIDS elements. Results of studies described in the test plan and IUCLID database provide data to address all of the SIDS elements required by the HPV Challenge except those for reproductive/developmental toxicity. The test plan proposes additional work using OECD guideline 422 to address this data gap. The only other unaddressed SIDS element in this submission appears to be the failure to include the structural formula of MOCA in the test plan and/or robust summaries,

In summary, adequate studies are apparently available to address all required SIDS elements except reproductive/developmental toxicity, and an additional study to address this element is proposed. Whereas some discussion of measures taken to limit environmental and consumer exposure may not be required, it would be a welcome addition to this submission.

Thank you for this opportunity to comment.

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